

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)
IMPLANT PRODUCTS LIABILITY) MDL NO. 2272
LITIGATION)
)
This Document Relates to the) Master Docket Case No. 1:11-cv-05468
Below Listed Cases)
) Honorable Rebecca Pallmeyer

James Krammes, et al. v. Zimmer, Inc., et al., 1:11-cv-05488
Beverly Goldberg v. Zimmer Holdings, Inc., et al., 1:11-cv-06425
Margaret Loveday, et al. v. Zimmer, Inc., et al., 1:11-cv-05752
Victoria Messina, et al. v. Zimmer, Inc., et al., 1:11-cv-06423
Corda B. Gaddy v. Zimmer, Inc., et al., 1:12-cv-00089

**JOINT STIPULATION ON ZIMMER ENTITIES'
MOTION FOR ENLARGEMENT OF TIME (Dkt. 380)**

The Zimmer Entities¹ and the plaintiffs in the above-listed matters (together, the "Parties") jointly stipulate to the following:

1. The Zimmer Entities' Motion For Enlargement Of Time To Reply In Support Of Their Motion For Suggestion Of Remand, Dkt. 380 ("Motion For Time"), should be granted and the Zimmer Entities shall have until May 14, 2012, to file their reply in support of their Motion for Suggestion of Remand. Dkt. 236.
2. Plaintiffs Margaret Loveday and Victoria Messinas' Opposition To Zimmer Entities' Motion For Suggestion Of Remand, including the supporting declaration of Joseph A.

¹ For purposes of this stipulation, "Zimmer Entities" includes the following defendants in this action: Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., Wilson/Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., and Zimmer US, Inc.

Fetto, M.D., is hereby deemed withdrawn. Dkt. 373. The Zimmer Entities agree not to seek discovery of Dr. Fetto except as set forth in the discovery plan or as may become relevant to other issues in the case.

3. Plaintiffs Margaret Loveday and Victoria Messina shall have until April 19, 2012, to respond to the Zimmer Entities' Motion For Suggestion of Remand, without a supporting expert declaration or affidavit.

4. The Zimmer Entities' Motion For Suggestion Of Remand shall be heard at the MDL No. 2272 Status Conference currently scheduled for June 1, 2012.

WHEREFORE, the Parties respectfully move the Court to enter an order approving the terms of this joint stipulation and adopting its terms as the Court's ruling on the Zimmer Entities' Motion For Time, and granting all other appropriate relief.

Dated: April 9, 2012

Respectfully submitted,

<p>FAEGRE BAKER DANIELS LLP</p> <p><u>/s/ Joseph H. Yeager, Jr.</u></p> <p>Joseph H. Yeager, Jr. (Ind. State Bar #2083-49) Andrea Roberts Pierson (Ind. State Bar #18435-49-A) 300 North Meridian Street, Suite 2700 Indianapolis, IN 46204 Telephone: (317) 237-0300 Fax: (317) 237-1000 Email: jay.yeager@faegrebd.com andrea.pierson@faegrebd.com</p> <p>Attorneys for Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., Wilson/Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., and Zimmer US, Inc.</p>	<p>ANAPOL, SCHWARTZ, WEISS, COHAN, FELDMAN & SMALLEY, PC</p> <p><u>/s/ James Ronca</u></p> <p>James Ronca, Esq. (SBN 25631) 1710 Spruce Street Philadelphia, PA 19103 Telephone: (215)735-1130 Fax: (866)735-2792 Email: Jronca@anapolschwartz.com</p> <p>Plaintiffs' Co-Lead Counsel</p>
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CERTIFICATE OF SERVICE

I certify that on April 9, 2012, a copy of the foregoing Joint Stipulation On Zimmer Entities' Motion For Enlargement Of Time (Dkt. 380) was filed electronically. Parties may access this filing through the Court's ECF/CFM system.

/s/ Joseph H. Yeager, Jr.